

September 28, 2011

Ex Parte

Julius Genachowski
Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Contributions to the Telecommunications Relay Services Fund, CG Docket No. 11-47

Dear Chairman Genachowski:

Citrix Online LLC (“Citrix Online”) strongly supports the Commission’s work to increase access to telecommunications products and services to all Americans. Citrix Online’s innovative work-shifting products, such as GoToMyPC, empower anyone to do his or her job from any location using a computer and Internet connection. This means that employers can hire the best talent regardless of their location or ability to travel to a central workplace — and it allows employees to work from anywhere through virtual meetings, training, and customer service. Furthermore, Citrix Online’s collaboration products, such as GoToMeeting, GoToWebinar, and GoToTraining, permit users to attend business meetings, conferences, and training sessions regardless of their location or mobility.¹

Our products facilitate telework, distance learning, remote job training and myriad other business and consumer applications and services. The result: improved worker productivity, accommodation of flexible employee schedules, reduced employer overhead, improved ability of employers to retain the best talent regardless of location, less environmental degradation due to travel and commuting — and, in the context of accessibility, far greater access to employment and training for Americans with limited mobility.

Integrated non-interconnected VoIP technology is important to our products. The technology allows far-flung employees in multiple locations to engage in real-time collaboration including shared virtual workspaces and audio and video communications — all without the cost or technical limitations of traditional voice or email service.² Innovators like Citrix Online therefore rely on non-interconnected VoIP to build voice capabilities into a wide range of services and products. For example, our HD Faces service — a simple high-definition group video conferencing product that uses non-interconnected VoIP — is a powerful tool that allows hearing-impaired customers to conduct their business or engage in personal communication.

¹ See Comments of Citrix Online LLC, CG Docket No. 11-47, at 1-4 (“COL Comments”).
² COL Comments at 4.

Citrix developed this capability not in order to fulfill a regulatory obligation, but because doing so is good business. This kind of innovation and integration should be encouraged.

As the Commission considers imposing TRS contribution requirements on non-interconnected VoIP, the Commission certainly should not undermine innovation or the integration of voice or video capability into emerging services. But forcing providers to disaggregate integrated services simply to enable regulation would do just that. Specifically, the Commission should recognize that certain tightly integrated services do not generate assessable stand-alone VoIP revenue. As a consequence, the FCC should extend its existing *de minimis* contribution requirement to these services.³ If the Commission does require providers to disaggregate their non-interconnected VoIP revenue, it should, as it has with other revenue allocations, permit providers to use good faith estimates. While requiring companies to disaggregate non-interconnected VoIP revenues will impose significant new back office and accounting costs no matter how it is implemented, a good faith estimate option will at least allow innovators some flexibility.⁴

A copy of this letter is being filed in the above-referenced docket.

Respectfully submitted,



Brett Caine
President
Citrix Online LLC

³ COL Comments at 5-7.

⁴ COL Comments at 7-8.